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1  
2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF NEW YORK  
4 Case No. 1:23-cv-00369-NRM-RML

5 -----x

6 UNITED STATES OF AMERICA,  
7 Plaintiff,

8  
9 - against -

10  
11 RARE BREED TRIGGERS, LLC; RARE BREED  
12 FIREARMS, LLC; LAWRENCE DEMONICO, KEVIN  
13 MAXWELL,

14 Defendants.

15 -----x

16 July 14, 2023

17 9:39 a.m.

18  
19 Remote video-teleconference  
20 deposition via Zoom of ANTHONY CIRAVOLO,  
21 pursuant to notice, before Jineen Pavesi,  
22 a Registered Professional Reporter,  
23 Registered Merit Reporter, Certified  
24 Realtime Reporter and Notary Public of the  
25 State of New York.

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1  
2 APP E A R A N C E S :  
3 BREON PEACE  
4 UNITED STATES ATTORNEY  
5 EASTERN DISTRICT OF NEW YORK  
6 225 Cadman Plaza East  
7 Brooklyn, New York 11201  
8 Attorneys for Plaintiff  
9 BY: MICHAEL BLUME, ESQ.  
10 michael.blume@usdoj.gov  
11 PAULINA STAMATELOS, ESQ.  
12 pauline.stamatelos@usdoj.gov  
13 DAVID COOPER, ESQ.  
14 david.cooper@usdoj.gov  
15  
16 DILLON LAW GROUP INC.  
17 50 Park Place, Suite 1105  
18 Newark, New Jersey 07102  
19 Attorneys for Defendants  
20 BY: JOSIAH CONTARINO, ESQ.  
21 jcontarino@dhillonlw.com  
22  
23 DILLON LAW GROUP INC.  
24 177 Post Street, Suite 700  
25 San Francisco, California 94108  
26 Attorneys for Defendants  
27 BY: MICHAEL A. COLUMBO, ESQ.  
28 mcolumbo@dhillonlaw.com  
29  
30 ALSO PRESENT:  
31 ERICA BRANGWYNNE, ATF  
32 KEVIN McCUALEY, ATF  
33 HOLLY LUDVIGSEN, ATF  
34 BEN HILLER, ATF  
35 KEVIN MAXWELL  
36 LAWRENCE DeMONICO

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2                   The documents that I review, I  
3 review them to determine ATF's prior  
4 classification history, possible other  
5 determinations that show similar devices  
6 in operation or principle, but they don't  
7 necessarily bear an effect on my direct  
8 examination of that item or my final  
9 classification of that item.

10          Q.        Would those prior  
11 classifications be examples of  
12 documents -- prior classifications of  
13 other similar devices, I think that's the  
14 best I can do with how you phrased it?

15          A.        Generally speaking, yes.

16          Q.        Are those prior classifications  
17 an example of documents that you reviewed  
18 but did not rely on in forming your  
19 conclusion for this expert report?

20          A.        I don't rely on them in the  
21 sense of it helps me determine what the  
22 device I'm currently examining is.

23                   I rely on them to see that my  
24 classification is consistent with prior  
25 classifications of similar devices.

1 CIRAVOLO

2 trigger, what would a user have to do to  
3 fire another round?

4 A. Nothing, they would simply  
5 maintain the constant rearward pressure  
6 that they were doing.

7 If they released the trigger  
8 completely, as in no contact with the  
9 trigger, they would have to place their  
10 finger back on the trigger and initiate  
11 another firing sequence.

12 Q. And what does it mean to  
13 initiate another firing sequence?

14 A. It means to engage the trigger  
15 of the host firearm and in an AR-15 type  
16 firearm, that's done by making contact  
17 with the trigger and then pulling it to  
18 the rear.

19 Q. Can you pull the trigger in the  
20 FRT-15 without engaging another firing  
21 sequence?

22 A. No, you cannot; once you  
23 initiate the initial firing sequence, the  
24 cycle is continued.

25 Q. What if there is slack in the